

**THE UNITED STATES DISTRICT COURT
FOR THE UNITED STATES VIRGIN ISLANDS
BANKRUPTCY DIVISION**

In re:)	
)	Bankruptcy No. 06-30009
JEFFREY J. PROSSER,)	Chapter 7
)	
Debtor.)	
)	
)	
<hr style="width: 40%; margin-left: 0;"/>)	
OAKLAND BENTA, JEFFREY J.)	
PROSSER, AND DAWN E. PROSSER,)	
)	Adv. Pro. No. 3:21-ap-03001-MFW
Plaintiffs,)	
v.)	
)	
CHRISTIE’S INC., CHARLES ANTIN,)	
FOX ROTHSCHILD LLP, YANN)	
GERON, WILLIAM H. STASSEN,)	
DAVID M. NISSMAN, JAMES P.)	
CARROLL)	
)	
Defendants.)	
<hr style="width: 40%; margin-left: 0;"/>)	

**SECOND JOINT MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFFS’ COMPLAINT**

Plaintiffs Jeffrey J. Prosser, Dawn Prosser and Oakland Benta (“Plaintiffs”) and Defendants Christie’s, Inc., Charles Antin, Fox Rothschild LLP, Yann Geron, William H. Stassen, David M. Nissman and James P. Carroll (“Defendants” and together with Plaintiffs, “the Parties”) hereby move for an extension of time for Defendants to respond to Plaintiffs’ complaint [DE 1] (the “Complaint”) from October 21, 2021 to November 2, 2021 and for a subsequent revised briefing schedule.

On July 20, 2021, Plaintiffs filed the Complaint commencing the above-captioned adversary proceeding, Adv. Pro. No. 3:21-ap-03001-MFW, against Defendants in the United States District Court for the United States Virgin Islands, Bankruptcy Division. On July 20,

2021, the Court issued Summons and Notices of Pretrial Conference [DE 4 and 5] setting forth
Defendants' time to respond to the Complaint as on or before August 19, 2021.

On August 10, 2021, the Parties filed a Joint Motion of Time to Respond to Plaintiff's Complaint (the "Joint Motion") requesting that Defendants' time to respond to the Complaint be extended to October 21, 2021 and for a subsequent briefing schedule as follows:

1. Defendants shall file a response to the Complaint on or before October 21, 2021.
2. Plaintiffs shall file an opposition to any motion filed by Defendants in response to the Complaint within 60 days after the filing of Defendants' response.
3. Defendants shall file a reply to Plaintiffs' opposition within 30 days after the filing of Plaintiff's opposition.

The Court entered an order granting the Joint Motion on August 17, 2021.

The parties have now agreed to further extend the deadline for Defendants to file a response to the Complaint and to a revised briefing schedule, as set forth below:

1. Defendants shall file a response to the Complaint on or before November 2, 2021.
2. Plaintiffs shall file an opposition to any motion filed by Defendants in response to the Complaint within 60 days after the filing of Defendants' response.
3. Defendants shall file a reply to Plaintiffs' opposition within 30 days after the filing of Plaintiff's opposition.

CONCLUSION

WHEREFORE, Defendants respectfully request that the Court:

- (A) extend Defendants' time to respond to Plaintiffs' Complaint to November 2, 2021; and
- (B) set a briefing schedule that (1) Plaintiffs shall file an opposition to any motion filed by Defendants in response to the Complaint within 60 days after the filing of

Defendants' response; and (2) Defendants shall file a reply to Plaintiffs' opposition within 30 days after the filing of Plaintiff's opposition.

Dated: October ____ 2021

FOX ROTHSCHILD LLP

HUNTON ANDREWS KURTH LLP

By: /s/ Elizabeth Viele
Elizabeth C. Viele, Esq.
101 Park Avenue, Suite 1700
New York, NY 10178
Phone: (212) 878-7900


By: /s/ Joseph Patella
Joseph Patella, Esq.
200 Park Avenue
52nd Floor
New York, NY 10166
Phone: (212) 850-2839

*Attorneys for Defendants Fox Rothschild LLP,
William H. Stassen, James P. Carroll, and Yann
Geron*

*Attorneys for Defendants Christie's Inc.,
Charles Antin, and David M. Nissman*


**LAW OFFICES OF LAWRENCE H.
SCHOENBACH**

By: /s/ Lawrence Schoenbach
Lawrence H. Schoenbach, Esq.
111 Broadway, Suite 901
New York, NY 10006
Phone: (212) 346-2400

By: 
Dawn E. Prosser
P.O. Box 3426
Palm Beach, FL 33480

Attorneys for Plaintiff Jeffrey J. Prosser

Plaintiff, pro se

By: 
Oakland Benta
P.O. Box 3388
Frederikstead
St. Croix USVI 00841

Plaintiff, pro se